REMARKS

Responsive to the Office Action mailed November 24, 2008, Applicant provides the following. Claims 1, 2, 10, 11, 14, and 19 have been amended. The claims have been amended without adding new matter. No claims have been added. Claim 13 has been canceled without prejudice. Nineteen (19) claims remain pending in the application: Claims 1-12 and 14-20. Reconsideration of claims 1-12 and 14-20 in view of the amendments above and remarks below is respectfully requested.

Claim Objections

Applicant thanks the Examiner for noting the claim objections. Applicant has amended the objected claims.

Specifically, Applicant replaced a period with a semicolon in claim 1, line 13, and Applicant deleted the first "includes" in claim 14, line 2.

Applicant believes that both objections have been corrected and respectfully requests that the corresponding objections be withdrawn.

Claim Rejections - 35 U.S.C. §112

Claim 2 stands rejected under 35 U.S.C § 112 second paragraph for being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, it is asserted that the claim 2 limitation "if the unique customer identification received at the does not match the stored unique customer identification" fails to show where the customer identification is received.

Applicant has amended claim 2 and asserts that the above deficiency is remedied. In particular, the relevant part of claim 2 is amended to now read "if the unique customer identification received at the <u>server</u> does not match the stored unique customer identification."

Accordingly, Applicant asserts that the amendment makes the claim definite and has overcome the § 112 rejection. Applicant respectfully requests that the corresponding rejection be withdrawn.

Claim Rejections - 35 U.S.C. §103

Claims 1, 2, 9-13, 15, 16, and 18 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over U.S. Patent Pub. No 2004/0181598 (Paya et al., hereinafter Paya) in view of U.S. Patent No. 7,269,624 (Malik). Applicant respectfully traverses.

Paya discloses a method for managing state information between a server and a remote web browser via a stateless protocol. (Paya [0007]-[0008]). Specifically, the first time a client contacts a server, a client identifier is generated and transmitted to the client via a coded URL from the server. (FIG. 2). Then, every time the client communicates with the server, the server checks if there is a client identifier. (FIG. 2). If so, the identifier is extracted from the URL in the received request and embedded content is sent from the server to the client. (FIG. 3).

Malik discloses an email system where users remotely manage an email system from one of the user's destination email addresses. Users send instruction emails to a remote email server that has a special address or unique internal identifier for authentication. (Col. 3, lines 30-43). When authenticated, the email may contain instructions to the server to perform various functions as directed by the user. (Col. 3, lines 43-59).

A. The Combination of Paya and Malik Fails to Teach All Limitations of At Least Independent Claims 1, 9, 10, and Amended Claim 11.

To establish a prima facie case of obviousness ... the prior art reference (or references when combined) must teach or suggest all the claim limitations. *In re Vaeck*, 947 F.2d 488, 20

USPQ2d 1438 (Fed. Cir. 1991); *see* M.P.E.P. § 706.02(j).

Applicant respectfully asserts that the above references, alone or in combination, fail to teach "communicating the unique customer identification to, a client running the client application, and other servers running a plurality of server applications" for at least Applicant's independent claims 1, 9, and 10 and "at least one additional server computer running an additional server software application, said additional server computer operably connected to the server computer and client computer over a network and operable to provide information services to the user, and operable to receive the unique customer identification from the server computer and authenticate the user via the unique customer identification when the user communicates with the additional server software application" for at least Applicant's amended independent claim 11.

Specifically, both Malik and Paya only disclose a client communicating with one identification server. (*See* Paya FIG. 1 and Malik FIG. 2). Neither reference discloses the claimed step of "communicating the unique customer identification to . . . other servers running a plurality of server applications." At best, both Paya and Malik only disclose that a client application communicates with a serve. Both references fail to disclose servers communicating with other servers or communicating client identifiers to other servers. Therefore, Applicant asserts that the combination of references fails to teach or suggest all claim limitations and respectfully requests that the corresponding rejections to at least claims 1, 9, 10 and amended claim 11 be withdrawn.

Further, Paya and Malik, either alone or in combination, fail to teach "authenticating the user by matching the unique customer identification received at the first server or one of the other servers with the unique customer identification stored on the first server or one of the other servers." Neither reference discloses a client application authenticating with a second server. At best, Paya and Malik disclose authenticating with one (a first) server. Therefore, Applicant asserts that the combination of references fails to teach or suggest all claim limitations and

respectfully requests that the corresponding rejections to at least claims 1, 9, 10, and amended

claim 11 be withdrawn.

B. The Limitations of At Least Claims 1, 9, 10, and 11 Are Not Obvious

Additionally, Applicant argues that the above limitations for at least claims 1, 9, 10,

amended claim 11 are not obvious because the references teach away from the above claimed

limitations. A prior art reference must be considered in its entirety, i.e., as a whole, including

portions that would lead away from the claimed invention. M.P.E.P. § 2142.02(VI).

Paya and Malik teach away from both communicating and from authenticating unique

customer identifications to multiple servers. That is, both references teach communicating and

authenticating the client only at a single first server.

Paya additionally teaches away from communicating customer identifications to multiple

servers by stating:

> Storing the web content or container document 116 having the client identifier as
> server-inaccessible information (e.g. cached content) in a memory area (e.g. the
> client browser cache) provides greater security for the client identifier than using
> a memory area (e.g., a cookie jar) storing server-accessible information (e.g., a
> cookie).

(Paya [0033]). Paya stores the client identifier in server-inaccessible memory for greater security

so that other servers cannot read or change the client identifier. Thus, communicating the

customer identifier from the first server to a plurality of other servers allows multiple servers

access to the customer identifier which, according to Paya, provides reduced security because the

client identifier is server-accessible on multiple servers instead of just one server. Therefore,

Applicant asserts that the claimed limitations are not obvious over the combined prior art

because the prior art teaches away from the limitations and respectfully requests that the

rejections for at least claims 1, 9, 10, and amended claim 11 be withdrawn.

Finally with respect to claims 1, 9, 10, and amended claim 11, Applicant asserts that the above argument also shows that modifying either Paya or Malik to communicate or authenticate customer identifiers to a plurality of servers would change either reference's principle of operation (*see* M.P.E.P. § 2143.01(VI)) and make both unsatisfactory for their intended purposes (*see* M.P.E.P. § 2143.01(V)). Therefore, Applicant again asserts that claims 1, 9, 10, and amended claim 11 are not obvious and respectfully requests that the corresponding rejections be withdrawn.

C. The Limitations of At Least Claims 2, 12, 15, 16, and 18 Are Not Obvious

Claims 2, 12, 15, 16, and 18 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Paya in view of Malik. Applicant has demonstrated above that the combination of Paya and Malik does not teach or suggest various features recited in independent claims 1 or 11, and those claim limitations are not obvious. Accordingly, the above-identified dependent claims are believed to be patentable at least by virtue of their respective dependencies upon patentable independent claims 1 and 11, respectively.

D. The Limitations of At Least Claims 3 and 6 Are Not Obvious

Claims 3 and 6 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Paya in view of Malik and in further view of U.S. Patent No. 6,324,648 (Grantges). Applicant has demonstrated above that the combination of Paya and Malik does not teach or suggest various features recited in independent claim 1, and those claim limitations are not obvious. Applicant asserts that Grantges fails to teach, suggest, or render obvious, alone or in combination, the above independent claim. Accordingly, the above-identified dependent claims are believed to be patentable at least by virtue of their respective dependencies upon patentable independent claim 1.

E. The Limitations of At Least Claims 5 and 8 Are Not Obvious

Claims 5 and 8 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Paya in view of Malik and in further view of U.S. Patent No. 5,764,915 (Heimsoth). Applicant has demonstrated above that the combination of Paya and Malik does not teach or suggest various features recited in independent claim 1, and those claim limitations are not obvious. Applicant asserts that Heimsoth fails to teach, suggest, or render obvious, alone or in combination, the above independent claim. Accordingly, the above-identified dependent claims are believed to be patentable at least by virtue of their respective dependencies upon patentable independent claim 1.

F. The Limitations of At Least Claims 4 and 7 Are Not Obvious

Claims 4 and 7 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Paya in view of Malik and in further view of U.S. Patent Pub. No. 2002/0010776 (Lerner). Applicant has demonstrated above that the combination of Paya and Malik does not teach or suggest various features recited in independent claim 1, and those claim limitations are not obvious. Applicant asserts that Lerner fails to teach, suggest, or render obvious, alone or in combination, the above independent claim. Accordingly, the above-identified dependent claims are believed to be patentable at least by virtue of their respective dependencies upon patentable independent claim 1.

G. The Limitations of At Least Claims 14 and 17 Are Not Obvious

Claims 14 and 17 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Paya in view of Malik and in further view of U.S. Patent Pub. No. 2002/0184539 (Fukuda et al.). Applicant has demonstrated above that the combination of Paya and Malik does not teach or suggest various features recited in independent claim 1, and those claim limitations are not obvious. Applicant asserts that Fukuda et al. fails to teach, suggest, or render obvious, alone or in combination, the above independent claim. Accordingly, the above-identified dependent claims are believed to be patentable at least by virtue of their respective dependencies upon patentable independent claim 1.

H. The Limitations of At Least Claims 19 and 20 Are Not Obvious

Claims 19 and 20 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Paya in view of Malik and in further view of U.S. Patent No. 5,678,041 (Baker). Applicant has demonstrated above that the combination of Paya and Malik does not teach or suggest various features recited in independent claim 11, and those claim limitations are not obvious. Applicant asserts that Baker fails to teach, suggest, or render obvious, alone or in combination, the above independent claim. Accordingly, the above-identified dependent claims are believed to be patentable at least by virtue of their respective dependencies upon patentable independent claim 11.

Support for the Claim Amendments

Claims 1, 2, 10, 14, and 19 are amended to change formatting and do not add new matter to the claims.

Claim 11 incorporates the limitations of now cancelled claim 13 and does not add new matter to the claim.
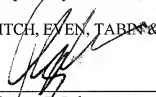
CONCLUSION

Applicants submit that all the pending claims are now in condition for allowance and accordingly a notice of allowance is respectfully requested.

Respectfully submitted,

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